

AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Florida

United States of America

v.

JEREMY MANN,

Case No. 23-MJ-6027-AOV

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 6/23/2022 to 1/19/2023 in the county of Broward in the Southern District of Florida, the defendant(s) violated:

Code Section	Offense Description
18 U.S.C. § 2251(a)	Attempted Production of Child Pornography
18 U.S.C. § 2422(b)	Attempted coercion and enticement of a minor to engage in illicit sexual activity
18 U.S.C. § 2252(a)(4)(B) and (b)(2).	Possession of Child Pornography

This criminal complaint is based on these facts:

See attached affidavit

☒ Continued on the attached sheet.



Complainant's signature

Yelena Reinstein-Owens, Special Agent, FBI

Printed name and title

Attested to by the Applicant in accordance with the requirements of Fed.R.Crim.P. 4.1 by Facetime.

Date: January 20, 2023



Judge's signature

City and state: Ft. Lauderdale, FL

Alicia O. Valle, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Yelena Reinstein-Owens, having been duly sworn, state as follows:

AGENT INTRODUCTION AND BACKGROUND

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI") and have been so employed since June 2006. I am presently assigned to the FBI Miami Division's Child Exploitation and Human Trafficking Task Force. In this capacity, I am responsible for conducting criminal investigations of statutes contained in Title 18 of the United States Code, including crimes related to child sex trafficking, child pornography and the sexual exploitation of children, among other violations of federal law. I have participated in investigations of persons suspected of violating federal child pornography and child sex trafficking laws, including 18 U.S.C. §§ 2251, 2252, 2422, and 1591. These investigations have included the use of surveillance techniques, the interviewing of subjects and witnesses, and the planning and execution of arrest, search, and seizure warrants. In the course of these investigations, I have reviewed images and videos containing child pornography and images depicting minor children engaged in sexually explicit conduct on various forms of electronic media, including computers, digital cameras, and wireless telephones, and have discussed and reviewed these materials with other law enforcement officers.

2. This Affidavit is made for the purpose of establishing probable cause in support of a criminal complaint charging Jeremy Mann ("MANN") with attempted production of child pornography in violation of Title 18, United States Code, Section 2251(a), attempted coercion and enticement of a minor to engage in illicit sexual activity in violation of Title 18, United States Code, Section 2422(b) and possession of child pornography in violation of Title 18 U.S.C. section 2252(a)(4)(B) and (b)(2).

3. I submit this Affidavit based on information known to me personally from the investigation, as well as information obtained from others who have investigated the matter or have personal knowledge of the facts herein. Since this affidavit is being submitted for the limited purpose of securing a criminal complaint, it does not include every fact known to me about this matter.

PROBABLE CAUSE

4. On or about June 23, 2022, an FBI employee acting in an undercover capacity (hereafter, "UC 1"), in Southern District of Alabama, was contacted on Kik, an online messaging system, by user, "headhuncho04", vanity name "Jay U" later identified as MANN.

5. UC 1 was portraying himself online as the father of a 14-year-old daughter. MANN made it immediately known that he had a sexual interest in UC 1's purported 14-year-old daughter. He asked if his daughter wanted to see his penis. UC 1 offered to let MANN text the daughter directly and MANN was provided a phone number also controlled by UC 1.

6. MANN reached out for UC 1's purported daughter on the phone number he was provided. During the chat, MANN advised UC 1 that he was a friend of her dad's and asked her age. The UC 1's purported daughter told MANN she was only 14 years old. He attempted to Facetime her so she could him masturbating. Further, during the chat, UC 1 stated, "Explain to me why you're different than every other guy", to which MANN replied "I want u to play with ur tight sel", "Self" followed by "I'm rubbing one rn". MANN asked the child for a picture, and he was sent a picture of what appeared to be a 14-year-old child. MANN sent a picture of himself to the purported child. MANN requested the child send him pictures of her vagina and breasts specifically MANN asked the child for pictures of "Ur boobs ass and pussy". He also described the video he wanted the child to make, "Do a strip down then turn and show ur butt and bend over

and spend ur ass and then play with ur pussy". The child told MANN that she was concerned that someone would see it and she was only 14 years old. MANN told UC 1 not to be shy and that he would not share the video with anyone.

7. On or about July 1, 2022, after fully identifying MANN, FBI Mobile sent a lead FBI Miami to investigate MANN. FBI Mobile provided an address for MANN in Tamarac Florida. On July 25, 2022, an FBI employee acting in an undercover capacity (hereafter, "UC 2"), in Southern District of Florida, contacted MANN on Kik, via his Kik username, "headhuncho04". UC 2 advised MANN that she was looking for her friend Jeremy because something happened to his account. MANN stated that he maybe the wrong Jeremy, but he can still talk with UC 2.

8. MANN asked UC 2 her age, to which UC 2 replied that she was 13 years old. MANN identified himself as being 27 years old and employed at Dunkin Donuts. MANN asked for UC 2's picture. UC 2 sent a picture. The picture was not of a real child. UC 2 asked for a picture of MANN. MANN sent a live camera picture depicting the individual, who had been identified as MANN. MANN advised UC 2 that he was masturbating to her picture and asked for additional pictures of UC 2. Upon receiving another picture sent by UC 2, MANN advised "Ya I'm rubbing my dick to ur pic" and later stated, "Ur pussy getting wet". UC 2 replied "A little" to which MANN stated, "I wish I could see".

9. Later in the conversation, MANN told UC 2 that he was at the mall walking by Victoria Secret. UC 2 informed MANN that PINK was her favorite store. Later in conversation, MANN asked for UC 2's panties size because he was at the PINK store. UC 2 asked "So if u bought me the panties what would I have to do". MANN stated "I wanna see ur pussy and boobs". UC 2 asked how she would get the panties from MANN. Upon discussing that both UC 2 and

MANN reside in Florida, MANN suggested that UC 2's parents can drop her off at the Coral Square mall near where MANN works.

10. MANN told UC 2 that he purchased panties for her and sent pictures of the panties, as well as, a live camera picture of the PINK bag in which they were purchased. UC 2 asked, "Like what u wanna see". MAN replied "Ur pussy and ass". UC 2 clarified, "So like my legs spread" to which MANN replied "Ya". MANN continued to insist that unless UC 2 send him the pictures, he would return the panties and get a refund.

11. On or about June 24, 2022, law enforcement issued a subpoena to Sprint for records related to MANN'S telephone number and Sprint provided an address for MANN in Tamarac, Florida.

12. On or about June 24, 2022, law enforcement issued a subpoena to Kik for records related to headhuncho04. On or about June 28, 2022, results were received from Kik with the following subscriber information:

First name: Jay

Last name: U

Email: jeremymann37@gmail.com

Login IPs: included IP address 139.138.118.70

13. On or about August 11, 2022, law enforcement issued a subpoena to Blue Stream, the Internet Service Provider for above noted IP address: 139.138.118.70 with date range of June 22, 2022 to August 11, 2022. On or about September 1, 2022, results were received, noting subscriber as Rhoda Mann, with a listed address of 9892 S. Belfort Circle, Tamarac, Florida.

14. DAVID query for Jeremy Mann was conducted, yielding an individual with that name, Date of Birth: February xx, 1995, with a listed address of 9892 S. Belfort Circle, Tamarac, Florida 33321.

15. On January 19, 2023, FBI Agents went to the residence noted above. An individual who identified himself as Jeremy Mann answered the door. Mann subsequently consented to an interview. Interview was initially not recorded, however, upon MANN making admission to possession of child pornography, MANN was read and signed the Miranda rights, and subsequent interview was audio recorded. Agents reviewed everything that MANN stated prior to the recording. During the interview, MANN noted that his phone number is 954-899-9791. MANN admitted to utilizing numerous Kik accounts, to include headhuncho04. MANN noted that he has a two-year-old son with his fiancé, who lives with her parents. MANN noted that her parents do not trust him because they are afraid that he will steal the son. MANN noted that he was into child pornography prior to having a child, describing it as a fantasy. MANN advised that he has watched over 1,000 videos of child pornography that include children as young as six years old. MANN further informed that he belongs to numerous Kik groups, in which child pornography is shared. MANN was not one hundred percent confident that he distributed child pornography, however, noted that he possibly or probably distributed the child pornography videos to others.

16. MANN admitted that he communicated with two individuals who identified their ages as 13 and 14 years old. He admitted that he requested that they produce child pornography of themselves to send to him. Specifically in conversation with the 13-year-old female, MANN recalled that he requested pictures of her boobs and pussy, indicating that his reasoning was to see if they would actually do it. The Agents asked whether MANN recalled making a statement

to the 14-year-old female, "Do a strip down then turn and show ur butt and bend over and spend ur ass and then play with ur pussy", to which MANN stated yes.

17. Further, during the interview, MANN indicated that he still has videos of child pornography on his phone, which he described as I-Phone 14 Plus. MANN consented to search of his phone. During review of MANN's telephone, numerous videos of child pornography, were located in MANN's camera roll. The videos included children which appeared to be as young as four of five years old. Preliminary review of four of the videos are described are as follows:

- Video 1 depicted a female child under the age of five (5) or six (6) performing oral sex on an adult male penis in a bathtub. Video was downloaded approximately on January 12, 2023.

- Video 2 depicts an adult male having vaginal sex with a child on the table, who appears to be five or six years old. The male is subsequently having sex with the child from behind. Video was downloaded approximately on January 9, 2023.

- Video 3 depicts a pre-pubescent child with legs spread and adult female performing oral sex on the child. Video was downloaded approximately on March 22, 2022.

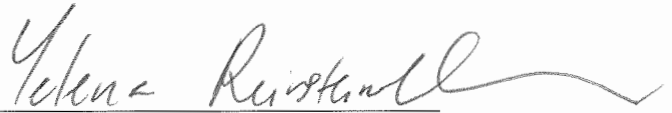
- Video 4 depicts a pre-pubescent child with ropes tied on wrists wearing a hello kiddy helmet performing oral sex on adult male. Video was download approximately on November 27, 2022.

CONCLUSION

18. Based on the aforementioned facts and information, I respectfully submit that there is probable cause to charge MANN with attempted production of child pornography, in violation of Title 18, United States Code, Section 2251(a), attempted coercion and enticement of a minor to

engage in illicit sexual activity in violation of Title 18, United States Code, Section 2422(b) and Possession of Child Pornography, in violation of Title 18, United States Code, Section 2252(a)(4)(B) and (b)(2).

FURTHER YOUR AFFIANT SAYETH NAUGHT.



Yelena Reinstein-Owens, Special Agent
Federal Bureau of Investigation

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 via facetime/Whatapp on this 20th day of January 2023.



ALICIA O. VALLE
UNITED STATES MAGISTRATE JUDGE

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NUMBER: 23-MJ-6027-AOV

BOND RECOMMENDATION

DEFENDANT: JEREMY MANN

Pre-Trial Detention recommended
(Personal Surety) (Corporate Surety) (Cash) (Pre-Trial Detention)

By: M. Catherine Koontz
AUSA: M. CATHERINE KOONTZ

Last Known Address: _____

What Facility: _____

Agent(s): Yelena Reinstein-Owens SA FB
(FBI) (SECRET SERVICE) (DEA) (IRS) (ICE) (**OTHER**)